REMARKS

Claims 1, 3, 4, 6-17, and 19-30 are pending and were rejected. Claims 1, 6, 7, 13, 14, and 30 have been amended herein. No claims have been cancelled herein. Reconsideration of the rejections of all pending claims is requested.

I. Objection to Claims 6, 7, 13, and 14

Claims 6, 7, 13, and 14 were objected to as being dependent on cancelled claims. These errors have been corrected via amendments.

II. Rejection of Claims 1, 3, 4, and 6-16 Under 35 U.S.C. §112

Claims 1, 3, 4, and 6-16 were rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. There was insufficient antecedent basis for the term "the source tree" in claim 1. The remaining claims were rejected due to their dependence on claim 1.

Claim 1, as amended herein overcomes the rejection. Accordingly, reconsideration of the rejection is requested.

III. Rejection of Claims 1,3, 4, 6-17, and 19-30 Under 35 U.S.C. §103(a)

Claims 1,3, 4, 6-17, and 19-30 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saulpaugh (U.S. 6,792,466) in view of Gupta (6,513,059).

CLAIM 1

Claim 1 is independent and is stated as follows for convenience:

A method for automatically generating source code for manipulating at least one mark-up language message based on a mark-up message definition, the method comprising:

receiving the mark-up language message definition;

generating a first in-memory representation of the message definition based on the received message definition;

generating a second in-memory representation of a source code based on the first in-memory representation of the message definition, said generating a second in memory representation comprising generating a schema object tree by employing a blackboard architecture that includes agents and solutions; wherein the schema object tree includes one or more nodes; and wherein the nodes of the schema object tree are agents and the nodes of an associated source object tree are the solutions; and

generating source files based on the second in-memory representation of the source code.

According to the office action, Saulpaugh discloses "generating a schema object tree" at column 41, lines 46-63. The applicant respectfully disagrees with the holding of the office action. The portion of Saulpaugh cited in the office action refers to a tree type display wherein services and the like are advertised. The schema object tree, on the other hand, is an operation used with a mark up language. Examples of the schema object tree as used in the claims are provided at table 8, page 17 of the specification. Source code generated based on the schema object tree is provided at table 9, page 20 of the specification.

Clearly, the schema object tree of claim 1 is not a tree-type display used to advertise as disclosed by Saulpaugh. As stated above, the schema object tree of claim 1 is a programming tool or the like and not a display of advertisements.

In addition, there is no motivation for the combination of Saulpaugh and Gupta. Saulpaugh is directed toward construction of message endpoints and Gupta is directed toward a system and method for facilitating exchange of information on a computer network. There is no motivation provided to combine these unrelated references. Thus, their combination is not proper.

Based on the foregoing, the cited references do not disclose all the elements of claim 1 and their combination is not proper. Therefore, the references cannot render claim 1 obvious.

CLAIMS 3, 4, AND 6-16

Claims 3, 4, and 6-16 are dependent on claim 1 and are deemed allowable by way of their dependence and for other reasons. Based on the foregoing, the applicant requests reconsideration of the rejections.

CLAIM 17

Claim 17 is independent and is stated as follows for convenience:

> A system for generating source code for manipulating at least one mark-up language message comprising: a first module for receiving a message definition and based thereon for generating a first in memory data structure that corresponds to the message definition, wherein the first data structure comprises a plurality of nodes; a second module for receiving the first data structure and based thereon for generating a second in memory data structure that corresponds to source code for manipulating at least one mark-up language message, wherein the second data structure comprises a plurality of nodes; a blackboard architecture, wherein the nodes of the first data structure are agents and the nodes of the second data structure are solutions.

Claim 17 was rejected on the same grounds as claim 1. Therefore, the applicant incorporates the rebuttals to the rejection of claim 1 into claim 17. Based on the foregoing the applicant requests reconsideration of the rejection.

CLAIMS 19-21

Claims 19-21 are dependent on claim 17 and are deemed allowable by way of their dependence and for other reasons. Based on the foregoing, the applicant requests reconsideration of the rejections.

CLAIM 22

Claim 22 was rejected on the same grounds as claim 17. Therefore, the applicant applies the rebuttals to the rejection of claim 17 to this rebuttal to the rejection of claim 22.

CLAIMS 23-30

Claims 23-30 are dependent on claim 22 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicant requests reconsideration of the rejections.

Based on the foregoing, the applicant contends that the rejections have been overcome and requests reconsideration.

Respectfully submitted,
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